

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Abdi Nazemian, et al.,
Plaintiffs,
vs.

NVIDIA Corporation,
Defendant.

Andre Dubus III, et al.,
Plaintiffs,
vs.

NVIDIA Corporation,
Defendant.

Case No. 4:24-cv-01454-JST (SK)
Case No. 4:24-cv-02655-JST (SK)

**JOINT STIPULATION AND [PROPOSED]
ORDER RE DEPOSITION PROTOCOL
SUBMISSION DEADLINE**

Pursuant to Civil Local Rule 7-12, the undersigned Parties to the above-captioned action, by and through their respective counsel of record, hereby stipulate the following:

1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar for an Initial Case Management Conference, (Case No. 4:24-cv-01454-JST (SK) (“*Nazemian*”), ECF No. 66; Case No. 4:24-cv-02655-JST (SK) (“*Dubus*”), ECF No. 56), and the Court ordered the Parties to meet and confer on a proposed case schedule (*Nazemian*, ECF No. 68; *Dubus*, ECF No. 57);

2. WHEREAS, on September 9, 2024 in the *Nazemian* case and on September 10, 2024 in the *Dubus* case the Parties submitted a stipulated case schedule, which included March 25, 2025 as the deadline by which the parties must submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas (*Nazemian*, ECF No. 70; *Dubus*, ECF No. 58);

3. WHEREAS, on September 11, 2024, the Court ordered the parties’ stipulated case schedule, including the Deposition Protocol submission deadline (*Nazemian*, ECF No. 71; *Dubus*, ECF No. 59);

4. WHEREAS, on March 6 and 12, 2025, additional counsel joined the case for Plaintiffs (*Nazemian*, ECF Nos. 106-122, 124-26);

5. WHEREAS, the Parties believe that an extension of the Deposition Protocol deadline is needed so they can make progress toward a stipulated protocol; and

6. WHEREAS, the requested extension will not affect any other date scheduled in this case;

NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties and their respective counsel, subject to the Court’s approval, that the Parties’ deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, shall be extended from March 25, 2025 to April 24, 2025.

1 Dated: March 21, 2025

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

3 Joseph R. Saveri (SBN 130064)
4 Christopher K.L. Young (SBN 318371)
5 Evan Creutz (SBN 349728)
6 Elissa A. Buchanan (SBN 249996)
7 William Castillo Guardado (SBN 294159)
8 **JOSEPH SAVERI LAW FIRM, LLP**
9 601 California Street, Suite 1505
10 San Francisco, California 94108
11 Telephone: (415) 500-6800
12 Facsimile: (415) 395-9940
13 jsaveri@saverilawfirm.com
14 cyoung@saverilawfirm.com
15 ecreutz@saverilawfirm.com
16 eabuchanan@saverilawfirm.com
17 wcastillo@saverilawfirm.com

18 Matthew Butterick (SBN 250953)
19 1920 Hillhurst Avenue, #406
20 Los Angeles, CA 90027
21 Telephone: (323) 968-2632
22 Facsimile: (415) 395-9940
23 mb@buttericklaw.com

24 Brian D. Clark (admitted *pro hac vice*)
25 Laura M. Matson (admitted *pro hac vice*)
26 Arielle Wagner (admitted *pro hac vice*)
27 Eura Chang (admitted *pro hac vice*)
28 **LOCKRIDGE GRINDAL NAUEN PLLP**
29 100 Washington Avenue South, Suite 2200
30 Minneapolis, MN 55401
31 Telephone: (612)339-6900
32 Facsimile: (612)339-0981
33 bdclark@locklaw.com
34 lmmatson@locklaw.com
35 aswagner@locklaw.com
36 echang@locklaw.com

37 Justin A. Nelson (admitted *pro hac vice*)
38 Alejandra C. Salinas (admitted *pro hac vice*)
39 **SUSMAN GODFREY L.L.P**
40 1000 Louisiana Street, Suite 5100
41 Houston, TX 77002-5096
42 Telephone: (713) 651-9366

jnelson@susmangodfrey.com
asalinas@susmangodfrey.com

Rohit D. Nath (SBN 316062)
SUSMAN GODFREY L.L.P
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-2906
Telephone: (310) 789-3100
RNath@susmangodfrey.com

Elisha Barron (admitted *pro hac vice*)
Craig Smyser (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P
One Manhattan West, 51st Floor
New York, NY 10019
Telephone: (212) 336-8330
ebarron@susmangodfrey.com
csmyser@susmangodfrey.com

Jordan W. Connors (admitted *pro hac vice*)
Trevor D. Nystrom (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P
401 Union Street, Suite 3000
Seattle, WA 98101
Telephone: (206) 516-3880
jconnors@susmangodfrey.com
tnystrom@susmangodfrey.com

Rachel J. Geman (pro hac vice)
Danna Z. Elmasry (pro hac vice)
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
250 Hudson Street, 8th Floor
New York, NY 10013
Tel.: 212.355.9500
rgeman@lchb.com
delmasry@lchb.com

Anne B. Shaver
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111
Tel.: 415.956.1000
ashaver@lchb.com

Betsy A. Sugar (pro hac vice)
LIEFF CABRASER HEIMANN

& BERNSTEIN, LLP

222 2nd Avenue S. Suite 1640

Nashville, TN 37201

Tel.: 615.313.9000

bsugar@lchb.com

Attorneys for the Nazemian Plaintiffs and the Proposed Class

1 Dated: March 21, 2025

Respectfully submitted,

2 By: /s/ Bryan L. Clobes

3 Bryan L. Clobes (admitted *pro hac vice*)

4 Alexander J. Sweatman (admitted *pro hac vice*)

5 Mohammed Rathur (admitted *pro hac vice*)

**CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP**

135 South LaSalle Street, Suite 3210

Chicago, IL 60603

Tel: 312-782-4880

6 bclobes@caffertyclobes.com

7 asweatman@caffertyclobes.com

8 mrathur@caffertyclobes.com

9 David A. Straite (admitted *pro hac vice*)

10 **DiCELLO LEVITT LLP**

485 Lexington Avenue, Suite 1001

11 New York, NY 10017

12 Tel. (646) 933-1000

dstraite@dicellolevitt.com

13 Amy E. Keller (admitted *pro hac vice*)

14 Nada Djordjevic (admitted *pro hac vice*)

15 James A. Ulwick (admitted *pro hac vice*)

DiCELLO LEVITT LLP

16 Ten North Dearborn Street, Sixth Floor

Chicago, Illinois 60602

17 Tel. (312) 214-7900

18 akeller@dicellolevitt.com

ndjordjevic@dicellolevitt.com

19 julwick@dicellolevitt.com

20 Brian O'Mara (SBN 229737)

DiCELLO LEVITT LLP

21 4747 Executive Drive

San Diego, California 92121

22 Telephone: (619) 923-3939

23 Facsimile: (619) 923-4233

briano@dicellolevitt.com

24 *Counsel for the Dubus Plaintiffs and Proposed Class*

1 Dated: March 21, 2025

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &**
4 **SULLIVAN, LLP**

5 Sean S. Pak (SBN 219032)
6 seanpak@quinnemanuel.com
7 50 California Street, 22nd Floor
8 San Francisco, CA 94111
9 Telephone: (415) 875-6600
10 Facsimile: (415) 875-6700

11 Andrew H. Schapiro (admitted *pro hac vice*)
12 andrewschapiro@quinnemanuel.com
13 191 N. Wacker Drive, Suite 2700
14 Chicago, Illinois 60606
15 Telephone: (312) 705-7400
16 Facsimile: (312) 705-4001

17 Alex Spiro (admitted *pro hac vice*)
18 alexspiro@quinnemanuel.com
19 51 Madison Avenue, 22nd Floor
20 New York, NY 10010
21 Telephone: (212) 849-7000
22 Facsimile: (212) 849-7100

23 *Attorneys for Defendant NVIDIA Corporation*

[PROPOSED] ORDER

Pursuant to the stipulation of the Parties, it is hereby ORDERED that the Parties' deadline for filing an agreed upon Deposition Protocol, or filing a joint letter brief with the Parties' respective proposals shall be continued to April 24, 2025.

IT IS SO ORDERED.

Dated: _____

The Honorable Sallie Kim
U.S. Magistrate Judge

ATTESTATION PURSUANT TO CIVIL L.R. 5-1

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: March 21, 2025

/s/ Sean S. Pak
Sean S. Pak